

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED

October 07, 2021

Nathan Ochsner, Clerk of Court

United States of America )

v. )

Sami Bin Silm )

Case No. )

4:21-mj-2159 )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/25/2021, 08/26/2021, 09/07/2021 in the county of Harris/Fort Bend in theSouthern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

18 U.S.C. 2113(a),(d)

Bank Robbery

18 U.S.C. 924(c)(1)(A)(ii)

Brandishing a Firearm During and In Relation to a Crime Violence

This criminal complaint is based on these facts:

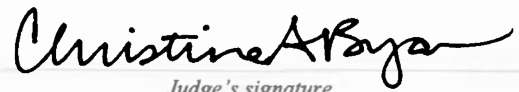
See Attached Affidavit in Support of Application

☒ Continued on the attached sheet.

Ryan Hilz, Task Force Officer FBI

Printed name and title

Sworn to before me via telephone,

Date: 10/07/2021

Judge's signature

City and state: Houston, Texas

Christina A. Bryan, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Ryan Hilz, being duly sworn, do hereby depose and state:

1. I am a Task Force Officer with the Federal Bureau of Investigation (hereafter “FBI”) and an Investigator with the Harris County Sheriff’s Office (hereafter “HCSO”) and have been employed by HCSO since November 2012. During my employment with HCSO and the FBI, I have been trained in investigations relating to violations of the United States Federal Criminal Code, including Title 18 of the United States Code (hereafter “USC”), specifically criminal violations involving organized crime, aggravated robbery, bank robbery, interference with commerce by threats or violence, and aggravated assaults. I am currently assigned to the Houston Division of the FBI, Violent Crime Task Force (hereafter “VCTF”), and have been since June 2020. My primary investigative responsibilities include crimes occurring within the Southern District of Texas.

2. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, witnesses and the defendant. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

3. Affiant was assigned to investigate three bank robberies which occurred on August 25, 2021, August 26, 2021, and September 7, 2021, at the Regions Bank located at 1502 Eldridge Pkwy,

Houston, Harris County, TX, at the Member's Choice Credit Union located at 1657 S. Fry Rd, Katy, Harris County, TX, and at the Regions Bank located at 18801 Somerled Ave, Richmond, Ft. Bend County, TX, respectively all within the Southern District of Texas. The incidents are documented under Houston Police Department original offense report number 1148137-21, Harris County Sheriff's Office original offense report number 2108-10270, and Ft. Bend County Sheriff's Office original report number 21-35496.

4. Affiant's Task Force Partners, TFO J. Bruzas and TFO L. Gibson, assigned to the Houston Police Department's Robbery Division and Affiant, responded to the first bank robbery of a Regions Bank at 1502 Eldridge Pkwy in Houston, TX on August 25, 2021. At the location, TFO Gibson spoke with the victim, teller Corena Hernandez, hereafter referred to as HERNANDEZ. TFO Gibson informed Affiant that he found HERNANDEZ credible and reliable. HERNANDEZ stated she was working at the teller counter when a black male subject, later identified as Sami Bin Silm and hereafter referred to as BIN SILM, approached her teller booth while pointing a pistol at her. HERNANDEZ stated BIN SILM placed a military style backpack that was olive drab in color on the teller station shelf and stated, "Give me what you got!" HERNANDEZ stated BIN SILM also stated, "Don't give me a dye pack" and "I don't want to harm anyone." HERNANDEZ moved to the cash dispenser machine and was able to get the default amount of \$750 out of the machine. BIN SILM said, "You know this is all FDIC insured, give me more!" HERNANDEZ explained she couldn't get any more money from the machine, so BIN SILM demanded she open her teller drawer. HERNANDEZ opened her teller drawer and showed him that it only contained a stack of marked bait bills. BIN SILM took the bait money, then began to walk around the bank pointing his pistol at other bank employees. BIN SILM called her towards the teller counter and again

asked, "Is that all?!" HERNANDEZ stated they all told him yes. HERNANDEZ stated BIN SILM then walked around the BANK again and then said, "Don't do nothing. I'm sure y'all don't want to spend the night in the hospital." He then exited the bank with the cash, totaling \$1,500.00 in his backpack. At the time of the bank robbery and while inside the bank, BIN SILM was observed to be wearing a black surgical mask, white framed sunglasses, a greenish brown sweatshirt with writing on the sleeves that said "Los Angeles," and a black Adidas baseball cap.

5. On August 26, 2021, TFO J. Bruzas and TFO L. Gibson then responded to another bank robbery at a Member's Choice Credit Union located at 1657 S Fry Rd in Katy, TX. At the location, TFO Gibson spoke with the victim teller, Destinee Cunningham, hereafter referred to as CUNNINGHAM and whom TFO Gibson finds credible and reliable. CUNNINGHAM stated she was working behind the teller counter when a black male, later identified as BIN SILM, walked behind her teller station and stated, "Don't move, I'm here to get the money" while pointing a pistol at her. BIN SIILM also stated, "I know you are FDIC insured." CUNNINGHAM stated she observed BIN SILM walk to her co-worker, who was in her office, and order her out of her office and tell her to stand next to CUNNINGHAM. It was at this time that CUNNINGHAM went to the money dispenser machine and hit the code to pull out the default amount of \$1,000 cash. BIN SILM stated to CUNNINGHAM, "I know you can get more money, just do what I say and everything will be ok." CUNNINGHAM then put the code into the money dispensary machine two more times, each time drawing out \$1,000 cash. BIN SILM placed a military style backpack that was olive drab in color on the teller station shelf and placed all the money in there. CUNNINGHAM stated BIN SILM then asked, "Do y'all have a vault in here?" CUNNINGHAM explained she couldn't get any more money from the machine and that there was no vault, so BIN SILM demanded she open her teller drawer. CUNNINGHAM opened her teller drawer and BIN

SILM looked at the cash from the drawer, but didn't take it. CUNNINGHAM stated BIN SILM observed a vehicle in the drive-thru lane and then stated, "Go take care of the lady at the drive thru." BIN SILM then walked out of the bank with the cash in the backpack, totaling \$3,000.00. He was observed via surveillance cameras leaving the area on a distinct red mid-90s model Daytona Triumph motorcycle. During the robbery, BIN SILM was observed to be wearing a black surgical mask, white framed sunglasses, a long-sleeved white shirt, and a black Adidas baseball cap. When watching surveillance video of this robbery, Affiant noted that BIN SILM wore a distinct multi-colored helmet as he fled the scene on the motorcycle.

6. On September 7, 2021, Affiant and TFO Gibson responded to a bank robbery of a Regions Bank at 18801 Somerled Ave in Richmond, TX. In addition to Affiant and Detective R. Hilz, several deputies with FBSO also responded to the scene and assisted with the investigation including FBSO Deputy V. Ocampo. Affiant finds FBSO Deputy V. Ocampo credible and reliable and can attest that FBSO Deputy V. Ocampo is a certified peace officer employed with the Fort Bend County Sheriff's Office. Upon arriving, Affiant learned from FBSO Deputy V. Ocampo that he spoke with victim teller Jacoby Porter, hereafter referred to as PORTER and whom FBSO Deputy V. Ocampo found credible and reliable. PORTER told FBSO Deputy V. Ocampo that he was working at the bank at the time of the robbery when a black male subject, later identified as BIN SILM, entered the bank armed with a pistol. BIN SILM demanded cash and PORTER gave BIN SILM \$750. BIN SILM then exited the bank with the cash. During the robbery, BIN SILM wore a black surgical mask and again fled the scene on a distinct red mid-90s model Daytona Triumph motorcycle.



7. During Affiant's investigation, Affiant made contact and spoke with an individual by the name of Troy Weatherford, hereafter referred to as WEATHERFORD and whom Affiant finds credible and reliable. Affiant spoke with WEATHERFORD during his investigation since WEATHERFORD briefly followed the motorcycle after the suspect left in the motorcycle after robbing the bank and until FBSO deputies caught up and continued the pursuit. Affiant learned that WEATHERFORD was present at the bank at the time of the robbery and followed the suspect from the bank until police took over in the police chase.

8. During his investigation, Affiant further reviewed the FBCSO report and learned the following: DPS Trooper C. Robinson, who is a certified peace officer and whom Affiant finds credible and reliable, attempted to stop the motorcycle in question that the suspect in the September 7, 2021 fled the scene on after the motorcycle fled the scene from the bank robbery. Affiant further learned that the motorcycle did not pull over and a police chase ensued which included DPS Trooper C. Robinson following in pursuit. Affiant learned from DPS Trooper C. Robinson that the chase lasted from the bank in Richmond, Fort Bend County, Texas and all the way up to the area of Grand Parkway and Kingsland Boulevard until DPS Trooper C. Robinson and other units lost the motorcycle that the bank robbery suspect fled in.

9. Additionally and hours following the chase, FBI Media Relations Division released a press release, noting that the suspect fled the location on a red motorcycle. It was later found that BIN SILM listed for sale on Facebook Marketplace his red mid-90s model Daytona Triumph motorcycle. Affiant noted the motorcycle listed for sale matched the motorcycle seen in surveillance images and Ft. Bend County Toll Road/ Flock camera footage exactly in terms of decals, colors, and finishes – specifically with a silver oval aftermarket sticker affixed to the front windshield. Affiant found a person's record for BIN SILM and noted he matched the subject

description from each bank in terms of height, weight, and skin tone. Affiant also noted that BIN SILM's listed address of 606 Admiral Bay Ln, Katy, TX 77494 is located near the Katy Mills Mall where deputies had lost sight of him. When looking at BIN SILM's Facebook profile, Affiant located photos of BIN SILM wearing the same black surgical mask as well as the greenish brown sweatshirt with writing on the sleeves that he was observed wearing on bank surveillance cameras during the 8/25/2021 robbery. Affiant also found that BIN SILM is currently out on bond for a theft and forgery case. Affiant found BIN SILM listed his address in his HPD arrest report as 606 Admiral Bay Ln, Katy, TX, which is also listed on his Texas Driver's License.

10. Upon identifying BIN SILM as a possible suspect, the HPD's Criminal Apprehension Team conducted surveillance at 606 Admiral Bay Ln in Katy, TX. While observing the residence, Officer J. Montelongo observed BIN SILM ride his motorcycle up to the residence while wearing the same distinct multi-colored helmet. BIN SILM pulled the motorcycle into the garage. Affiant also found several photos of BIN SILM wearing the multi-colored helmet posted on his Facebook account. Officer Montelongo also confirmed to your Affiant that the residence he surveilled matched the residence seen on Google Maps, despite some landscaping changes.

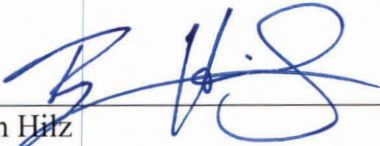
11. On October 4, 2021, Affiant obtained a search warrant for BIN SILM's residence, issued by Harris County 208<sup>th</sup> District Court Judge G. Glass. On October 5, 2021, TFO Gibson obtained a pocket arrest warrant for BIN SILM, issued by Harris County 208<sup>th</sup> District Court Judge G. Glass. On October 6, 2021, both the search and arrest warrants were served at BIN SILM's residence. While serving the search warrant, clothing seen in the surveillance footage, the multi-color helmet, and the windshield displaying the distinct oval shaped silver color sticker from the motorcycle were located and collected.

12. BIN SILM was transported to the FBI Main building, located at 1 Justice Park Drive Houston, Southern District of Texas, where he was interviewed by TFO Gibson and Affiant. BIN SILM was provided with his Miranda Warning, which he stated he understood and agreed to speak with us. During the interview, BIN SILM confessed that he found the pistol, which he identified as a Springfield .40 caliber pistol, used in the robberies laying in the bushes near an apartment complex near his house. BIN SILM confessed that he was not working and did not have any money, which drove him to commit the robberies. BIN SILM gave details of each robbery, including specific statements made to the victims, which corroborated the victims' accounts of the robberies. BIN SILM also positively identified himself in screen shots taken from surveillance video from each of the robbery locations. BIN SILM confessed that the day after the pursuit with units with Fort Bend County and DPS, he threw the pistol into a water retention pond in the west Harris County.

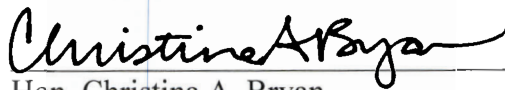
13. Further based on the foregoing your affiant believes there is probable cause to believe that on August 25, 2021, August 26, 2021, and September 7, 2021 BIN SILM committed the offense of bank robbery in violation of 18 United States Code, Section 2113(a),(d).



14. Further based on the foregoing your Affiant believes there is probable cause to believe that on August 25, 2021, August 26, 2021 and September 7, 2021, BIN SILM committed the offense of brandishing a firearm during and in relation to a crime of violence, bank robbery in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

  
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Ryan Hilz  
Task Force Officer  
Federal Bureau of Investigations

Sworn to and subscribed before me by telephone on this the 7<sup>th</sup> day of October, 2021 and I find probable cause.

  
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Hon. Christina A. Bryan  
United States Magistrate Judge